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Attorneys for Defendant(s)
THOMSON INTERNATIONAL, INC.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

MATTHEW PETERSON, SADIE FLODING,
COLIN STRUB, CARSON BRENDA, JODY
BARRY, TEISCHA BENSON, LYNNETTA
KLAM, and LORI DAVIES,

Plaintiff(s),

v.

THOMSON INTERNATIONAL,
INCORPORATED, a California corporation;
DOES 1-10, INCLUSIVE; and ROE
ENTITIES 1-10, INCLUSIVE,

Defendant(s).

Case No.: 1:22-cv-00701 JLT-CDB

**DECLARATION OF ROBERT L.
SALLANDER IN SUPPORT OF
DEFENDANT THOMSON
INTERNATIONAL, INC.'S MOTION TO
AMEND RULE 16 SCHEDULING ORDER**

Date: May 31, 2023
Time: 10:30 a.m.
Dept: 510 19th Street, Suite 200
Bakersfield, CA

Judge: Magistrate, Christopher D. Baker

I, Robert L. Sallander, declare as follows:

1. I am an attorney duly licensed to practice law in all the courts of California and am the Managing Partner at Greenan, Pepper, Sallander & Lally LLP, attorneys for defendant Thomson International, Inc. ("Thomson") in the above-captioned case.

2. This declaration is submitted in support of Thomson's Motion to Amend Rule 16 Scheduling Order.

1 3. I have personal knowledge of the matters set forth herein, that if called as a
2 witness, I could testify as to each of the matters herein.

3 4. On September 15, 2022, Thomson served the following discovery requests upon all
4 eight plaintiffs: (1) Interrogatories, Set One; and (2) Request for Production of Documents, Set
5 One.

6 5. Starting November 10, 2022, Thomson sent out authorizations to plaintiffs to
7 release their records from their medical providers, employers, Food & Drug Administration
8 (“FDA”), Centers for Disease Control and Prevention (“CDC”), and state and county public health
9 agencies, and has sent out all records requests after receipt of authorizations.

10 6. Despite Thomson’s diligence, 33 records are still outstanding.

11 7. On April 19, 2023, I met & conferred with plaintiff counsel Lindsay Lien Rinholen
12 concerning extending deadlines. Plaintiff counsel refused to extend the trial date.

13 8. On April 24, 2023, my office contacted the court concerning scheduling a hearing
14 for motion to amend schedule.

15 9. Thomson noticed depositions of plaintiffs for May 12, May 15-17, 2023 to preserve
16 rights, but will not be able to take meaningful depositions without the outstanding records.

17 I declare under penalty of perjury under the laws of the State of California that the
18 foregoing is true and correct.

19 Executed on this 26th day of April, 2023 in San Ramon, California.

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22 _____
23 Robert L. Sallander
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